

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOHN DOE,
Plaintiff,

VS.

**THE UNIVERSITY OF TEXAS M.D.
ANDERSON CANCER CENTER, ET
AL.,**
Defendants.

CIVIL ACTION NO. 4:21-CV-1356

JOINT STATUS REPORT

Pursuant to the Court's Order as indicated in the Hearing Minutes of September 1, 2023 [Dkt. 54], the parties submit this Joint Status Report for December 2023.

1. Lead Counsel

The Attorney in Charge for Plaintiffs is: Eddie M. Krenek
The Attorney in Charge for Defendants is: Benjamin S. Walton

2. Discovery Continuing

Written Discovery

Extensive written discovery was served by Plaintiff on Defendants, along with discovery from Defendants to Plaintiff. Substantial discovery responses were prepared and submitted/exchanged by the parties. Additionally, thousands of pages of documents were also served along with responses to requests for production and as part of Disclosures. Defendants will be making a rolling document production. Certain documents will require a protective order before being produced, and the parties are working amicably to submit appropriate proposed order(s) to facilitate that production.

The parties are reviewing and sifting through the various discovery responses and document production in preparation for depositions. To the extent there are any disputes concerning discovery responses, the parties will attempt to work through those.

Depositions

The parties are working towards scheduling depositions of the core parties in January, with Plaintiff being the first party to be deposed. The parties wish to go through the document productions prior to the commencement of depositions in this case.

3. Update on Procedural Status of Ancillary Case Pending Before Texas Supreme Court

Update (Reminder): [No change] The Texas Supreme Court has granted the Petitions for Review in Case No. 22-0667; Court of Appeals No. 14-20-00588-CV; Trial Court No. 2019-82179. Oral arguments before the Texas Supreme Court are set for Tuesday, January 9, 2024. The synopsis of this matter is set forth in the parties November 2023 Jt. Status Report, for the Court's easy reference.

The Parties do not currently believe that the Texas Supreme Court's decision in that case will directly affect the proceedings now before this honorable Federal Court; but the parties wish to apprise the Court of substantial activity occurring of a related nature.

4. Status Update on Criminal Proceedings that are Part of the Factual Events in Plaintiff's Complaint

There have been no further changes to the status of the pending criminal proceedings against Plaintiff. The parties do not anticipate any issues with these criminal proceedings that would prevent the depositions of Plaintiff and Individual Defendants to proceed, as discussed above. The Parties' Joint Status Report for October 2023 provides further context relating to the potential issues of concern.

Respectfully Submitted,

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**ATTORNEY-IN-CHARGE FOR
DEFENDANTS**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served upon the following counsel of record *via* the Court's ECF system on the 6th day of December, 2023:

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/s/ Eddie M. Krenek
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